



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

FEB 28 2017

CERTIFIED MAIL 7016 0600 0000 3846 7671  
RETURN RECEIPT REQUESTED

Ms. Bertha M. Goldenberg, P.E.  
Assistant Director, Regulatory Compliance & Planning  
Miami-Dade Water and Sewer Department  
Miami-Dade County  
3071 SW 38<sup>th</sup> Avenue  
Miami, Florida 33146

Re: Consent Decree (Case: No.: 1:12-cv-24400-FAM)  
Reference DOJ Case No.: 90-5-1-1-4022  
Section VI – Information Management System Program, Paragraph 19.(c).

Dear Ms. Goldenberg:

The United States Environmental Protection Agency Region 4 and the Florida Department of Environmental Protection (FDEP) are in receipt of Miami-Dade County's (Miami-Dade) December 4, 2015 submittal of the Information Management Systems (IMS) Program set forth in Paragraph 19.(c). of the above-referenced Consent Decree (CD). The EPA has consulted with FDEP and we have the following comments and/or questions on the IMS Program:

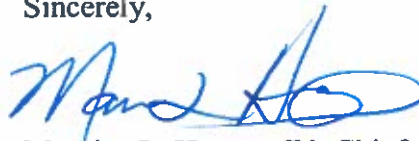
Comments on IMSP submitted 12/4/2015

1. Paragraph 19.(c).(ii). of the CD requires that the IMS Program provide an operations IMS component including operations reports and standard operation forms. Please provide an update of implementation of this component, especially SCADA.
2. Paragraph 19.(c).(iii). of the CD requires that the IMS Program provide a maintenance IMS component including maintenance reports and standard maintenance forms. Please provide an update of implementation of this component, especially GraniteXL to Granite Net within EAMS.
3. Paragraph 19.(c).(vi). of the CD requires that the IMS Program provide a description of the work reports that will be prepared and submitted, including examples and periodicity of review of such reports. Section 11 of the IMS Program gives a general description of the work reports and states most work reports are generated on demand. More specificity should be given on the periodicity of review of each of these type of work reports.
4. Paragraph 19.(c).(x).(A). of the CD requires that Miami-Dade update its GIS database to include all as-builts and Active As-built Supplemental Information System (AASIS) forms, including new and corrected asset attribute data by June 6, 2017. Please provide an update of the status of this work.

5. Paragraph 19.(c).(x).(G). of the CD requires that Miami-Dade measure elevations of all manhole rim elevations and sewer inverts at connections to manholes and pump stations and their inclusion into GIS by June 6, 2017. At the time of the IMS submittal, Miami-Dade had only collected 17% of the required elevations. Please provide an update of the status of this work.
6. Paragraph 19.(c).(xi). of the CD requires that Miami-Dade develop performance indicators. The number of SSOs per mile, or per hundred miles, of gravity sewer is listed in 4 places, under 3 programs, but the number of SSOs per mile of force main only appears under the IMS program. This suggests either an incomplete description was given, or the KPIs are not well developed and correlated across the CMOM Programs.
7. Paragraph 19.(c).(xii). of the CD requires that Miami-Dade track maintenance activities by type of maintenance (i.e. corrective, preventative or emergency). Miami-Dade insists it will continue to use its current system. Add a column to Table 16.1, and a field/category/etc. to the IMS trackers to group the numerous existing User and System Types into these three categories. The existing User and System Types can still be used under the three required headings.
8. Table 15.1: The table shows 1139 feet of emergency overflow. Please provide a detailed location(s) of these emergency overflows. Please evaluate whether these overflows need to be eliminated, revised or replaced.
9. Appendix A: Please provide a completion date for each of the tasks listed in the Appendix.

The EPA and FDEP will give final approval of the IMS Program pending answers to the above comments and/or questions. If you should have any questions regarding this matter, please contact Mr. Brad Ammons of the EPA at (404) 562-9769 or via email at [ammons.brad@epa.gov](mailto:ammons.brad@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Maurice L. Horsey, IV", is positioned above the typed name.

Maurice L. Horsey, IV, Chief  
Municipal and Industrial Enforcement Section  
NPDES Permitting and Enforcement Branch

cc: See Attached Mailing List

**Mailing List:**

Mr. Jonathan A. Glogau  
Office of the Attorney General

Mr. Kirk White  
Florida Department of Environmental Protection

Ms. Lisa Self  
Florida Department of Environmental Protection

Mayor Carlos A. Gimenez  
Miami-Dade County

Mr. Lester Sola  
Miami-Dade Water and Sewer Department

Mr. Jack Osterholt  
Miami-Dade Regulatory and Economic Resources

Ms. Abigail Price-Williams  
Miami-Dade County Attorney

Mr. William A. Weinischke  
U.S. Department of Justice

Ms. Rachael Amy Kamons  
U.S. Department of Justice